

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION**

UNITED STATES OF AMERICA)	INFORMATION NO. 4:22cr-82
)	
v.)	18 U.S.C. § 287
)	False, Fictitious, and Fraudulent
ROBERT LANOUE)	Claims
)	

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT ONE

False, Fictitious, and Fraudulent Claims
18 U.S.C. § 287

At all times relevant to this Information:

1. Defendant **ROBERT LANOUE** was a resident of Georgia. He was the manager and an owner of a scuba school and retail store operating as Scooba Shack in Richmond Hill and Savannah, Georgia, within the Southern District of Georgia.

2. The United States Department of Veterans Affairs (“VA”) was a department of the United States that provided education, health, and other benefits to veterans of the United States Armed Forces.

3. The Post-9/11 GI Bill was a VA education benefit program that paid for tuition, housing, and other costs for veterans who met certain eligibility requirements. Under the Post-9/11 GI Bill, tuition benefits were paid directly to VA-approved educational institutions, and housing and other costs were paid directly to veterans enrolled in VA-approved courses of study.

4. Educational institutions seeking VA approval to participate in the Post-9/11 GI Bill program had to apply to the VA and agree to comply with program rules.

Among other things, the institutions had to agree to maintain positive attendance records for enrolled veterans, promptly notify the VA of changes to veteran student enrollment, and maintain compliance with the “85-15” rule, pursuant to which educational institutions had to charge the same tuition rate to veteran students receiving VA benefits and non-veteran students, and no more than 85% of the enrollees in an approved course could be VA funded. Institutions also had to submit proposed course catalogs for approval.

5. On or about May 5, 2018, Scooba Shack applied to the VA for approval to provide certain courses of study to veterans through the Post-9/11 GI Bill.

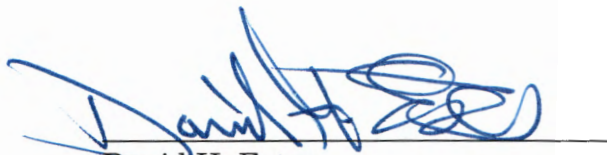
6. On or about July 23, 2018, Scooba Shack received VA approval to provide eight courses of study. Thereafter, Scooba Shack billed the VA between approximately \$2,488 and \$20,511 per veteran student enrollee for each course.

7. In or around October 2021, in Chatham County, within the Southern District of Georgia, and elsewhere, the defendant,

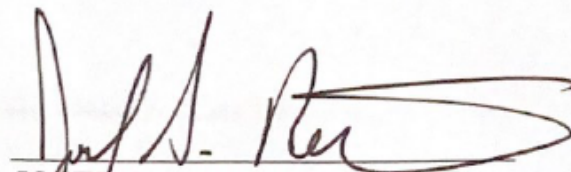
ROBERT LANOUE,

aided and abetted by others, knowingly made and presented and caused to be made and presented to the VA a claim upon and against the United States, that is, a claim for payment for scuba courses for veteran students, knowing that Scooba Shack was not in compliance with the 85-15 rule and knowing that the claim was false, fictitious, and fraudulent in that the claim falsely represented the hours of instruction received by veteran students and dates of attendance and completion for certain students.

All in violation of Title 18, United States Code, Sections 287 & 2.



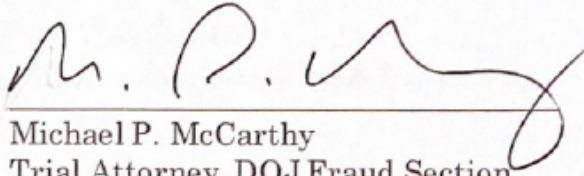
David H. Estes
United States Attorney



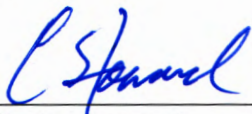
JOSEPH S. BEEMSTERBOER
Acting Chief, Fraud Section
U.S. Department of Justice



Patricia G. Rhodes
Assistant United States Attorney
Chief, Criminal Division



Michael P. McCarthy
Trial Attorney, DOJ Fraud Section



Chris Howard
Assistant United States Attorney
*Lead Counsel